

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

STEPHANIE CLIFFORD a.k.a. STORMY DANIELS, an individual,	:	Civil Action No. 2:19-CV-00119
	:	
	:	Judge: Michael H. Watson
	:	
Plaintiff,	:	Magistrate Judge: Elizabeth P. Deavers
	:	
v.	:	
	:	
SHANA M. KECKLEY, et. al.	:	
	:	
	:	
Defendants.	:	

STEPHANIE CLIFFORD AKA STORMY DANIELS	:	Civil Action No. 2:19-MC-47-MHW-KAJ
	:	
Plaintiff,	:	Judge: Michael H. Watson
	:	
v.	:	Magistrate Judge: Kimberly A. Jolson
	:	
DONALD J. TRUMP	:	
	:	
Defendant.	:	

NOTICE TO THE COURT

Plaintiff Stephanie Clifford files this Notice to bring to the Court’s attention a “NOTICE OF CLERICAL ERROR” by the Central District of California Court Clerk stating that putative judgment creditor Donald J. Trump **did not secure a money judgment** in *Clifford v. Trump*, Case No. CV 18-06893-SJO (FFMx) (Cal. C.D.). The “NOTICE OF CLERICAL ERROR” is attached as Exhibit A. Below, Plaintiff Clifford also advises the Court that:

1. Plaintiff Clifford obtained a settlement in a lawsuit she filed with this Court for a violation of her civil rights under 42 U.S.C. § 1983 by individual officers and the City of Columbus for false arrest. *Clifford v. Keckley, et al.*, Case No. 2:19-cv-119 (S.D. Ohio).

2. The amount of settlement is a matter of public record, \$450,000.00, and it seems that word of the monies caused two parties: Donald J. Trump and Michael Avenatti to attempt to assert liens over the settlement monies.

3. Donald J. Trump claimed a judgment lien based on a CIVIL MINUTE ORDER that awarded him \$293,052.33 in attorney fees, costs and sanctions from the Central District of California in *Clifford v. Trump*, Case No. CV 18-06893-SJO (FFMx) (Cal. C.D.).

4. Donald J. Trump claimed that the Central District of California's CIVIL MINUTE ORDER was a final judgment eligible for registration as a foreign money judgment under 28 U.S.C. § 1963. *See Clifford v. Keckley*, Case No. 2:19-cv-119 (S.D. Ohio) (the civil rights case); *Clifford v. Trump*, Case No. 2:19-MC-47 (S.D. Ohio) (proceeding to register foreign judgment).

5. As a result of his claims, Donald J. Trump claimed that he was entitled to a lien on Plaintiff Clifford's settlement proceeds. Plaintiff Clifford has objected to those claims.

6. On March 19, 2020, Plaintiff Clifford filed a motion with the Central District of California asserting that the CIVIL MINUTE ORDER was a not final money judgment and the clerk's certification was in error.

7. On April 10, 2020, the Central District of California issued a Notice of Clerical Error, making clear that the CIVIL MINUTE ORDER that Donald J. Trump sought to register in this district "was a Minute Order . . . , entered on 12/11/2018, [and] not a judgment. Therefore, it cannot be certified as a judgment." *See Exhibit A.*

8. Thus, based on the Central District of California's Notice of Clerical Error, Donald J. Trump **did not secure a money judgment against Plaintiff Clifford and is not entitled to a judicial lien on the settlement proceeds.** Accordingly, the Notice of Registration of Foreign Judgment, Dkt. No. 43, is without force and effect as there is no underlying foreign judgment. It should be stricken from the record a legal nullity.

9. The other party that claimed an adverse lien on the settlement proceeds—Michael Avenatti—has withdrawn his claim for a lien.

10. There being no adverse party before the Court with a valid judicial lien on the settlement proceeds, this Court should release those proceeds deposited with the Court to Ms. Clifford and her counsel.

Respectfully Submitted,

/s/ Chase A. Mallory

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/s/ Guy A. Fortney

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Attorneys for the Plaintiff

CERTIFICATE OF SERVICE

I certify that on April 10, 2020 a true and exact copy of the above and foregoing document was served via the Court's CM/ECF filing system to all registered counsel of record.

/s/ Guy A. Fortney

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

Stephanie Clifford

CASE NUMBER

PLAINTIFF(S)

2:18-cv-06893-JLS-FFMx

v.

Donald J. Trump

NOTICE OF CLERICAL ERROR

DEFENDANT(S)

You are hereby notified that due to a clerical error ☐ documents associated with the filing of the new action
☒ the following scanned document ☐ docket entry have/has been corrected as indicated below.

Title of scanned document: Clerk's Certification of a Judgment to be Registered in Another District

Filed date: _____ Document Number(s): _____

☐ Incorrect case number _____ was assigned to this ☐ action ☐ document☐ Case number has been corrected. The correct case number is _____☐ Incorrect judge's initials were indicated on this ☐ action ☐ document . The correct judge's initials are: _____☐ Incorrect magistrate judge's initials were indicated on this ☐ action ☐ document . The correct magistrate judge's initials are: _____ .☐ Case has been reassigned from ☐ Judge ☐ Magistrate Judge _____ to
☐ Judge ☐ Magistrate Judge _____. The initials of the new judge(s) are: _____☐ Case was assigned to ☐ Western ☐ Southern ☐ Eastern division. Pursuant to General Order 19-03, the case
has been reassigned to the ☐ Western ☐ Southern ☐ Eastern division. The former case number
_____ has been reassigned to new case number _____ .☐ Case title is corrected from _____ to _____☐ Document has been re-numbered as document number _____☐ Incorrect ☐ Filed Date ☐ Date of Document ☐ Date ENTERED on CM/ECF was stamped on the document.
The correct date is _____ .☐ Document is missing page number(s): _____☐ To ensure proper routing of documents, all documents filed with the court must reflect the following case number
and judge's initials: _____☒ Other: The attached Clerk's Certification of a Judgment to be Registered in Another District was issued in error by
the Clerk. The document referenced in the Certification was a Minute Order (dkt. #46), entered on
12/11/2018, not a judgment. Therefore, it cannot be certified as a judgment.

CLERK, U.S. DISTRICT COURT

Date: April 10, 2020By: C. Powers
Deputy Clerk**EXHIBIT****A**

AO 451 (Rev. 12/12) Clerk's Certification of a Judgment to be Registered in Another District

UNITED STATES DISTRICT COURT
for the
Central District of California

Stephanie Clifford a.k.a. Stormy Daniels

Plaintiff

v.

Donald J. Trump

Defendant

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Civil Action No. 18-cv-06893-SJO-FFM

CLERK'S CERTIFICATION OF A JUDGMENT TO BE REGISTERED IN ANOTHER DISTRICT

I certify that the attached judgment is a copy of a judgment entered by this court on (date) 12/11/2018.

I also certify that, as appears from this court's records, no motion listed in Fed. R. App. P. 4(a)(4)(A) is pending before this court, the time for appeal has expired, and no appeal has been filed or, if one was filed, it is no longer pending.

Date:

9-30-2019

CLERK OF COURT

Derek Davis

Signature of Clerk or Deputy Clerk

